

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER J. HADNAGY, an individual; and SOCIAL-ENGINEER, LLC, a Pennsylvania limited liability company,

Plaintiff,

v.

JEFF MOSS, an individual; DEF CON COMMUNICATIONS, INC., a Washington corporation; and DOES 1-10; and ROE ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

JOINT STIPULATION AND PROPOSED ORDER EXTENDING MEDIATION DEADLINE

Noted for Consideration: March 21, 2025

1 Plaintiffs Christopher J. Hadnagy and Social-Engineer, LLC (collectively,
 2 “Hadnagy”) and Defendants Def Con Communications, Inc. and Jeff Moss (collec-
 3 tively, “Def Con”), by and through their undersigned counsel of record, hereby stipu-
 4 late and agree as follows:

5 1. The Court entered a Scheduling Order on March 29, 2024 (ECF 45);

6 2. Def Con filed a Motion to Extend the Deadlines in the Scheduling Or-
 7 der on October 31, 2024 (ECF 69);

8 3. The Court granted Def Con’s Motion to Extend the Deadlines in the
 9 Scheduling Order and issued a revised Scheduling Order on November 15, 2024
 10 (ECF 75);

11 4. The revised Scheduling Order set the parties’ deadlines as follows:

Event	Current Deadline
Mediation Deadline	March 28, 2025
Plaintiffs’ Pre-Trial Statement	April 4, 2025
Defendants’ Pre-Trial Statement	April 18, 2025
Motions in Limine	April 18, 2025
Agreed CR 16.1 Pretrial Order	May 23, 2025
Jury Trial	July 28, 2025

19 5. On February 21, 2025, Def Con filed its Motion for Summary Judg-
 20 ment (ECF 79);

21 6. Hadnagy filed his Response to Def Con’s Motion for Summary Judg-
 22 ment on March 14, 2025;

23 7. Def Con is to file its Reply in support of its Motion for Summary Judg-
 24 ment on March 21, 2025;

25 8. The parties respectfully and jointly request that the Court extend the
 26 following deadlines, to allow time for Def Con’s Def Con’s Motion for Summary

Judgment to be ruled upon and for the parties to have a more productive mediation, as well as to accommodate Hadnagý's counsel's unavailability for an urgent family matter in April 2025:

Event	Proposed Deadline
Mediation Deadline	May 16, 2025
Plaintiffs' Pre-Trial Statement	May 23, 2025
Defendants' Pre-Trial Statement	June 6, 2025
Motions in Limine	June 6, 2025
Agreed CR 16.1 Pretrial Order	June 27, 2025

9. The date of trial shall remain on July 28, 2025;

10. Good cause exists for the parties' proposed extension of the deadlines in the revised Scheduling Order.

PERKINS COIE LLP

DATED this 21st of March 2025.

/s/ David A. Perez

David A. Perez, WSBA No. 43959
PERKINS COIE LLP
 1201 Third Avenue, Suite 4900
 Seattle, WA 98101-3099
 Telephone: 206.359.8000
 E-mail: DPerez@perkinscoie.com

Matthew J. Mertens
PERKINS COIE LLP
 1120 N.W. Couch Street 10th Floor
 Portland, OR 97209-4128
 Telephone: 503.727.2000
 Email: MMertens@perkinscoie.com

Lauren A. Trambley
PERKINS COIE LLP
 505 Howard Street, Suite 1000

San Francisco, CA 94105-3204
Telephone: 415.344.7000
Email: LTrambley@perkinscoie.com

*Attorneys for Defendants Jeff Moss and
Def Con Communications, Inc.*

FREY BUCK

DATED this 21st of March 2025.

/s/Mark Conrad

Ted Buck, WSBA #22029
Mark Conrad, WSBA #48135
FREY BUCK
1200 Fifth Avenue, Suite 1900
Seattle, WA 98101
Telephone: 206.486.8000

*Attorneys for Plaintiffs Christopher J.
Hahnagy and Social-Engineer, LLC*

Finding good cause to extend the parties' deadlines, the Court hereby
GRANTS the parties' Joint Stipulation and sets the remaining deadlines as follows:

Event	Proposed Deadline
Mediation Deadline	May 16, 2025
Plaintiffs' Pre-Trial Statement	May 23, 2025
Defendants' Pre-Trial Statement	June 6, 2025
Motions in Limine	June 6, 2025
Agreed CR 16.1 Pretrial Order	June 27, 2025
Jury Trial	July 28, 2025

IT IS SO ORDERED.

DATED this ____ day of _____ 2025.

Honorable Brian A. Tsuchida
United States District Court Judge